

UNITED STATES BANKRUPTCY COURT
District of Minnesota

In PAUL PEARSON

Debtor(s).

Chapter 7

Debtors' Response

Debtor, Paul Pearson, as and for his response to the trustee's objection to his claimed exemptions, provides as follows:

1 The trustee alleges that debtor does not use his business equipment in his trade. The trustee is wrong.

2 Debtor has worked in the carpeting and flooring business his entire life. He is now retired, but he continues to work for his son, on the side, to supplement his social security.

3 Debtor has attached the affidavit of his son regarding the debtor's continued use of his tools of the trade.

Executed on: 8/24/04

/e/ Barbara J. May

Barbara J. May

Attorney for Debtor(s)

4105 North Lexington

Suite 310

Arden Hills, MN 55126

Attorney ID Number: 129869

AFFIDAVIT OF JAMES PEARSON

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN) ss.

James Pearson, being first duly sworn, deposes and states as follows:

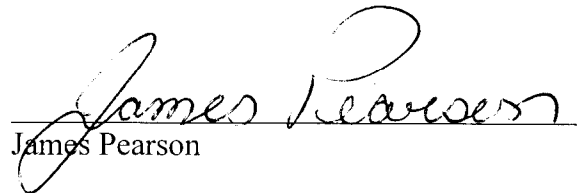
1. I am Paul Pearson's son and I also work with Paul Pearson in the business known as Floor Covering Specialists.

2. Floor Covering Specialists is an unincorporated business. I have primary responsibility for conducting business operations, which consist mostly of installation of various types of floor coverings.

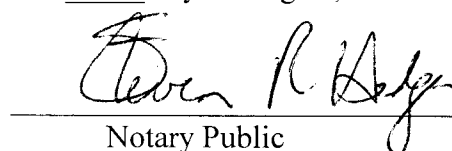
3. Paul Pearson is not formally employed by the business, but he does work with the business, mostly providing office support, responding to customer calls, helping with scheduling, providing support on bidding jobs. He consults with me and others, based on his many years of experience in this area of work, basically working as a subcontractor. The business has had little net income during the past year or so, but Paul Pearson has been paid from the business, based on the work he has done, as finances permit.

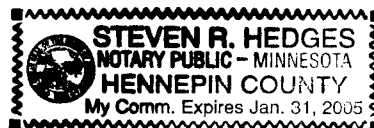
4. Paul Pearson provides his own equipment for the work he does. The business desks, other miscellaneous office furniture, a 30-year old forklift, and racking used in the business belong to Paul. While that equipment does not have much monetary value, it is used in the business in which Paul Pearson is involved.

FURTHER YOUR AFFIANT SAITH NOT.


James Pearson

Subscribed and sworn to before me
this 20th day of August, 2004.


Notary Public



STATE OF MINNESOTA)

Case No.

COUNTY OF RAMSEY)

Barbara J. May, under penalty of perjury, says that on the 24TH day of August, 2004, she served via US Mail, the Debtor's Response and Attached Affidavit upon:

U.S. Trustee
1015 U.S. Courthouse BY FAX
300 South 4th Street
Minneapolis, MN 55415

RANDY SEAVER
12400 PORTLAND AVE S BY FAX
SUITE 132

/e/ Barbara J. May

Barbara J. May